

21 C.J.S. Courts § 24

Corpus Juris Secundum | May 2023 Update

Courts

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II. Jurisdiction of Courts

C. Jurisdiction of Subject Matter or Cause of Action

2. Amount in Controversy Within Subject Matter Jurisdiction

a. General Considerations

§ 24. Independent subject matter jurisdiction apart from amount in controversy

[Topic Summary](#) | [References](#) | [Correlation Table](#)

West's Key Number Digest

West's Key Number Digest, [Courts](#)  119.1, 120, 121(1), 168

Under various constitutional and statutory provisions, particular and designated courts may have jurisdiction of specified classes of cases irrespective of the amount in controversy.

The amount in controversy does not always govern with respect to jurisdiction, for in certain classes of cases, constitutional or statutory provisions have conferred jurisdiction on particular designated courts regardless of the amount in controversy, the test of jurisdiction being found in the nature of the case made by the complaint and the relief sought.¹ Statutory jurisdictional amount limits may be inapplicable to particular statutory actions² or claims for equitable relief,³ injunctive relief,⁴ or declaratory relief.⁵

A specific statute granting a particular court subject matter jurisdiction over certain causes of action takes precedence over a general statute establishing the court's amount-in-controversy jurisdictional limit.⁶

A court's authority to function in multiple or alternative capacities with concurrent subject matter jurisdiction, as either a district court or a municipal court, provides a basis from exempting the court from a jurisdiction amount limitation applicable to one capacity when the court acts in another capacity expressly authorized by the legislature.⁷ However, that a statute grants a particular inferior court concurrent jurisdiction with a superior court in relation to certain statutory claims does not necessarily alter the lower court's amount jurisdiction to permit claims for damages in the statutory action in excess of the lower's court's jurisdiction limits.⁸

CUMULATIVE SUPPLEMENT

Cases:

Claims of testators' son against executor of estates, who was testators' daughter, were not subject to amount-in-controversy limits under statute granting concurrent jurisdiction to county court at law, and thus did not warrant dismissal of son's claims because he pleaded for damages in excess of statutory limit of \$500,000; son's claims were in the nature of a claim seeking to recover estate property from executor on behalf of estates, and were related to probate proceeding. [Tex. Gov't Code Ann. § 25.1672\(a\)\(2\)](#). [Jurgens v. Martin](#), 631 S.W.3d 385 (Tex. App. Eastland 2021).

[END OF SUPPLEMENT]

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Footnotes

- 1 [Conn.—Newtown Pool Service, LLC v. Pond](#), 140 Conn. App. 514, 59 A.3d 378 (2013).

[Mich.—Clohset v. No Name Corp.](#), 302 Mich. App. 550, 840 N.W.2d 375 (2013), appeal denied, 495 Mich. 990, 844 N.W.2d 725 (2014).

[R.I.—Park v. Ford Motor Co.](#), 844 A.2d 687 (R.I. 2004).
- 2 [Conn.—Newtown Pool Service, LLC v. Pond](#), 140 Conn. App. 514, 59 A.3d 378 (2013).

[Wyo.—Jessen v. Burry](#), 13 P.3d 1118 (Wyo. 2000).
- 3 [Fla.—Mitchell v. Beach Club of Hallandale Condominium Ass'n, Inc.](#), 17 So. 3d 1265 (Fla. 4th DCA 2009).

Mass.—*Zizza v. Zizza*, 456 Mass. 401, 923 N.E.2d 1018 (2010).

4 Fla.—*Mitchell v. Beach Club of Hallandale Condominium Ass'n, Inc.*, 17 So. 3d 1265 (Fla. 4th DCA 2009).

5 Mo.—*Tolbert v. Automotive Finance Corp.*, 341 S.W.3d 195, 88 A.L.R.6th 761 (Mo. Ct. App. W.D. 2011).

6 Mich.—*Clohset v. No Name Corp.*, 302 Mich. App. 550, 840 N.W.2d 375 (2013), appeal denied, 495 Mich. 990, 844 N.W.2d 725 (2014).

7 Wash.—*City of Seattle v. Sisley*, 164 Wash. App. 261, 263 P.3d 610 (Div. 1 2011).

8 Colo.—*Arnold v. Anton Co-op. Ass'n*, 293 P.3d 99 (Colo. App. 2011).

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